

# **EXHIBIT G**

CAUSE NO. 2019-77381

DAVID COOK,	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
ROWAN COMPANIES, INC. a/k/a	§	
ROWAN DRILLING and ROWAN	§	
DRILLING (UK) LIMITED,	§	
Defendants.	§	113 <sup>th</sup> JUDICIAL DISTRICT

**DEFENDANT ROWAN COMPANIES, INC.'S FIRST SUPPLEMENTAL  
RESPONSES TO PLAINTIFF'S REQUEST FOR DISCLOSURE**

TO: Plaintiff, David Cook, by and through his attorneys of record, Michael Patrick Doyle and Patrick M. Dennis, DOYLE LLP, 3401 Allen Parkway, Suite 100, Houston, Texas 77019

Rowan Companies, Inc., Defendant in the above-styled and numbered cause, hereby serves its First Supplemental Responses to Plaintiff's Request for Disclosure.

Respectfully submitted,

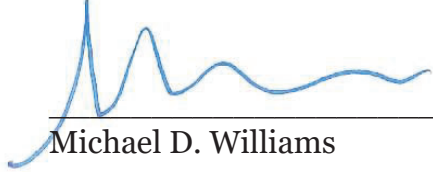
**BROWN SIMS**

By:   
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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of February, 2020 a true and correct copy of the foregoing document has been served on counsel of record in accordance with the Texas Rules of Civil Procedure.



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Michael D. Williams

**DEFENDANT ROWAN COMPANIES, INC.'S FIRST SUPPLEMENTAL  
RESPONSES TO PLAINTIFF'S REQUEST FOR DISCLOSURE**

- (a) The correct names of the parties to the lawsuit.

**RESPONSE:**

The correct name of this defendant is Rowan Companies, Inc. The correct name of the co-defendant is Rowan Drilling (UK) Limited.

- (b) The name, address, and telephone number of any potential parties.

**RESPONSE:**

Ralph Coffman Luxembourg S.a.r.l., 46A Avenue J.F. Kennedy, L-1855, Luxembourg, Grand Duchy of Luxembourg.

Stowen Ltd., Unit 1 James Watt Close, Great Yarmouth, NR31 0NX, +44 (0)1493 653903.

DC Tuning Engineering Services Ltd, 19 Birchwood Close, Seghill Cramlington, Whitley Bay, Tyne & Wear, United Kingdom, NE23 7HH.

- (c) The legal theories and, in general, the factual bases for your claims or defenses.

**RESPONSE:**

Defendant generally denies each of Plaintiff's allegations. In addition, Defendant denies that it is answerable for the alleged negligence of the ROWAN GORILLA VII or for its unseaworthiness. Defendant was not the owner, owner pro hac vice, or operator of the ROWAN GORILLA VII. Defendant further denies that any of Defendant's employees were responsible for any alleged conditions of negligence, negligence per se, or gross negligence. Defendant further denies that any of Plaintiff's claims can be governed by United States Maritime law or and laws other than those of the United Kingdom, Scotland, and the European Union. Defendant denies that the district courts of Harris County, Texas offer an appropriate forum. Defendant contends that Plaintiff's injuries were caused, in whole or in part, by Plaintiff's negligence in sitting on a pipe stack at a construction site.

- (d) The amount and any method of calculating economic damages.

**RESPONSE:**

Defendant is unable to provide the amount and method of calculating Plaintiffs' damages because Plaintiffs have not disclosed the amount and method of calculating damages. Defendant hereby incorporates by reference the reports and testimony of its designated experts, retained and non-retained, as to the amount and method of calculating and rebutting Plaintiffs' claims for damages. Defendant also incorporates by reference its answers to interrogatories regarding the same, as well as all responses to requests for production with respect to documents that rebut or contradict the amount, extent, and method of Plaintiffs' damage calculations.

- (e) The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

RESPONSE:

See Exhibit A, attached.

FIRST SUPPLEMENTAL RESPONSE:

See Exhibit A-1, attached.

- (f) For any testifying expert:
- (1) the expert's name, address and telephone number;
  - (2) the subject matter on which the expert will testify;
  - (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
  - (4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
    - (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
    - (B) the expert's current resume and bibliography.

RESPONSE:

Defendant has not yet designated any testifying experts and will supplement as required by the Texas Rules of Civil Procedure or as otherwise ordered by the Court.

For further response, see Exhibit B.

- (g) Any indemnity and insuring agreements described in Rule 192.3(f).

RESPONSE:

See attached, ROWAN 00084 to ROWAN 00134. Will supplement.

- (h) Any settlement agreements described in Rule 192.3(g).

RESPONSE:

None.

- (i) Any witness statements described in Rule 192.3(h).

RESPONSE:

See attached, ROWAN 00034 to ROWAN 00040 to ROWAN 00045 to ROWAN 00049.

- (j) In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

RESPONSE:

None.

- (k) In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

RESPONSE:

None.

- (l) The name, address, and telephone number of any person who may be designated as a responsible third party.

RESPONSE:

Ralph Coffman Luxembourg S.a.r.l., 46A Avenue J.F. Kennedy, L-1855, Luxembourg, Grand Duchy of Luxembourg.

Stowen Ltd., Unit 1 James Watt Close, Great Yarmouth, NR31 0NX, +44 (0)1493 653903.

DC Tuning Engineering Services Ltd, 19 Birchwood Close, Seghill Cramlington, Whitley Bay, Tyne & Wear, United Kingdom, NE23 7HH.

**Exhibit A-1**

	<b>Last Known Address</b>	<b>Notes</b>
David Cook	76 Briardene Way, Backworth, North Tyneside, NE27 0XQ  Contact Through His Attorneys: Michael Patrick Doyle and Patrick M. Dennis, DOYLE LLP, 3401 Allen Pky., Ste. 100, Houston, TX 77019, (713) 571- 1146	Plaintiff.
Rowan Companies, Inc., its employees and custodians of records	C T Corporation System, 811 Dallas Avenue, Houston, Texas 77002  Contact Through Their Attorneys: Michael D. Williams and Allen D. Hemphill, BROWN SIMS, 1177 West Loop South, 10 <sup>th</sup> Floor, Houston, TX 77027, (713) 629-1580	Defendant.
Rowan Drilling (UK) Limited, its employees and custodians of records, including:	CMS Cameron McKenna KKO, 6 Queens Road, Aberdeen, Scotland, AB15 4ZT, United Kingdom  Contact Through Their Attorneys: Michael D. Williams and Allen D. Hemphill, BROWN SIMS, 1177 West Loop South, 10th Floor, Houston, TX 77027, (713) 629-1580	Defendant.
Robin Kimber	59 Colthill Circle, Miltimber, Aberdeen AB13 0EH, 07718767943	Gorilla VII Rig Manager with knowledge about the scope of the project, safety practices, accident facts, and the roles of subcontractors.
Andrew Barker	29 Normanston Drive, Oulton Broad, Lowestoft, Suffolk NR32 2PS, 07500955085	Gorilla VII OIM/Superintendent with knowledge about the scope of the project, safety practices, accident facts,

**EXHIBIT****A-1**

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		and the roles of subcontractors.
Gavin Hedingham	6 Haremooss Drive, Portlethen, Aberdeen AB12 4UX, 07876 176 751	HSE Manager with knowledge about the scope of the project, safety practices, accident facts, and the roles of subcontractors.
Michael Staite	24 Sevenoaks Drive, Hastinghill, Sunderland, Tyne & Wear SR4 6LR, 07739 999 648	Toolpusher with knowledge about the scope of the project, safety practices, accident facts, and the roles of subcontractors.
John Paul Brophy	1 Glenmill Ave., Darnley Mains, Glasgow, Renfrewshire G53 7XF, 07576408708	Assistant Derrickman, Witnessed Accident.
Matthew Rex	Novanna Residence 384/291, Moo 100 Nongprue Bangamung, Pattaya, Chon Buri, Thailand 20150, 07805447291	Derrickman, Witnessed Accident.
Craig George	65 Lawsondale Terrace, Westhill, Aberdeenshire AB32 6SE, 07885 772380	Roughneck, Witnessed Accident
Liam Duddy	10 Kirk Mews, Watson St, Banchory, Aberdeenshire AB31 5NS, 07949117428	HSE Specialist with knowledge about the scope of the project, safety practices, accident facts, and the roles of subcontractors.
Matthew Powell	31 Raedykes Crescent, Stonehaven, Aberdeenshire AB39 3UD, 07725260457	Engineering Manager with knowledge about the scope of the project, safety practices, accident facts, and the roles of subcontractors.
Lee McQueen	18 Mond Road, Fazakerley, Liverpool, Lancashire L10 7LJ, 07789 063088	Safety Coordinator with knowledge about the scope of the project, safety practices, accident facts,

Robert Anderson	4 Ash Place, Kilmarnock Ayrshire, Scotland KA12HJ	and the roles of subcontractors.  Floorman
David Hewat	25C Dee Street Aberdeen, United Kingdom AB116AW	Floorman
James McDermott	4 Hounsfield Crescent East Herringthorpe, Rotherman United Kingdom S65 3PZ	Driller
James Porter	The Gables, 46 Cummersdale Road, Carlisle, United Kingdom CA2 6AX	Assistant Driller
Daniel Spike	32 Warmington Road Liverpool, United Kingdom L14 1QJ	Assistant Driller
Alex Stockton	53 Childwall Road Liverpool, United Kingdom L15 6UW	Floorman
Jamie Wilby	80 Grange Drive Swindon, United Kingdom SN3 4LD	Floorman
Richard Johnstone	54 Modley Place Ellon, United Kingdom AB19BB	Radio Operator
Sean Pearson	6 Greystone Place Tickhill, Doncaster, United Kingdom DN119Q7	Senior Barge Engineer

James Barker	18 Mallard Drive Montrose, United Kingdom DD109ND	Deck Pusher
John Ellison	15 Ronaldsway Fazakerley, Liverpool, United Kingdom L100AJ	Roustabout
Joseph O'Neill	8 Glengrove Leven, United Kingdom KY8 5BE	Assistant Driller
Kevin Sanderson	37 Hewitt Ryhope Sunderland, United Kingdom SR20DR	Floorman
Jonathan Ingram	52 Chaucer Road Great Yarmouth, United Kingdom NR304HA	Welder
Findlay Adams	Granite House Knowhead Freuchie, Cupar, United Kingdom Ky15 7hb	Assistant Crane Operator
Richard Watson	2 Selby Avenue Thornton-Cleveley's Lancashire, United Kingdom FY5 2QJ	Motorman

Karens Movsesjans	Bulta Street 8-107 Riga, Latvia 1057	Assistant Crane Operator
Christopher Thain	8 Burnside Street Findochty, Buckie United Kingdom, AB56 4QW	Roustabout
Kyle Doig	6 Western Avenue Perth, United Kingdom PH11NY	Electrician
Matthew Newton	4 Stonebridge Crescent Stockton on Tees United Kingdom TS17 5AZ	Maintenance Supervisor
Daniel Dusher	10 Stableway Kingswood, Hull United Kingdom HU73FA	Deck Pusher
Scott Milne	7 North Latch Road Breachin, United Kingdom DD9 6LF	Crane Operator
Gary Roe	5 Farday Street Hull, United Kingdom HU9 3EF	Assistant Crane Operator
John Catchpole	25 Rectory Carlton Colville, Lowestoft United Kingdom NR338BA	Roustabout
Biagio Falcone	28 Bryce Avenue Carron, Stirlingshire United Kingdom FK28JA	Roustabout

Brian Bransfield	18 Invrness Cress Kingston, Ontario Canada K7M6G9	Driller
James Rowland	123601 Highway 89 Jay, Florida USA 32565	Barge Engineer
David Storey	37 Cherry Grove Prudhoe, Northumberland United Kingdom NE426PT	Mechanic
Lewis Trevors	36 Rosedale Gardens Belton, Great Yarmouth United Kingdom NR319PN	Roustabout
Anthony Wyer	237 Garden Road Belnan, Nova Scotia Canada B2S2N4	Driller
Paul Bell	53 Kirkburn Laurencekirk, Aberdeenshire United Kingdom AB301LF	Safety Training Coordinator
George Keenan	Murrayknowe Farm, Cardenden Fife, United Kin KY5 0AE	Senior Mechanic
James Millar	16 Balmoral Terrace Dundee, Angus United Kingdom, DD48Sn	Assistant Crane Operator
Grant Davis	70 Lochinver Crescent Dundee, Angus United Kingdom, DD2TY	Electrician
David Ingram	9 Beech Avenue Ellon, Aberdeenshire United Kingdom, AB419EP	Materialsman

Graham Langley	170 Sherwoods Lane Aintree Liverpool, Merseyside United Kingdom, L101AB	Motorman
David Robson	Flat 3 59 Percy Park RD. Northshields, Tyne & Wear United Kingdom, NE304LH	Radio Operator
Stephen Pounder	120 The Broadway Grindon, Sunderland, Tyne & Wear United Kingdom, SR48NX	Welder
Warren Newsom	807 Hollywood Lake Loop Winnsboro, Louisiana 71295	Drilling Superintendent
Martin Vanis	Kurta Kondrada 24459 Prague, Praha 1900 Czech Republic	Senior Electronic Technic
Kirby A Walker	1545 Brown Mountain Road Centerville, Nova Scotia BoPIJO Canada	Rig Superintendent
Stowen Ltd., its employees, contractors, and custodians of records, including:	Unit 1 James Watt Close, Great Yarmouth, NR31 0NX, +44 (0)1493 653903	Rowan Drilling (UK) contractor that engaged and supervised Plaintiff.
Kurt Ford	Norwich, United Kingdom	Welder, Witnessed Accident.
Ewan McDonald	Brisbane, Australia	Rope Access Person/Welder, Witnessed Accident.
Neil Matheson	Aberdeen, United Kingdom	Rope Access Person, Witnesses Accident.
Graham Cuthbert	Cardenden, Fife, United Kingdom	NDT Technician, Witnessed Accident.
Colin Stewart	Great Yarmouth, Norfolk, United Kingdom	Technical Director with knowledge about the scope of the project, safety practices, and Stowen's responsibilities.

Keiron Ford	Norwich, United Kingdom	Technical Director with knowledge about the scope of the project, safety practices, Stowen's responsibilities, and the extent of Plaintiff's injuries.
Robert Catchpole	Gorleston on Sea, Norfolk, United Kingdom	QHSE for Stowen with knowledge about the scope of the project, safety practices, and Stowen's responsibilities.
The Department for Works and Pensions, its employees and custodians of records	The Pension Service 6, Post Handling Site A, Wolverhampton, WV98 1AJ United Kingdom	Has information regarding Plaintiff's pension payments, benefit claims and contentions, and loss of past and future earnings.
Ralph Coffman Luxembourg S.a.r.l.	46A Avenue J.F. Kennedy, L-1855, Luxembourg, Grand Duchy of Luxembourg	Vessel owner answerable to Plaintiff's claims to the extent those claims are colorable at law.
DC Tuning Engineering Services Ltd, its employees and custodians of records	19 Birchwood Close, Seghill Cramlington, Whitley Bay, Tyne & Wear, United Kingdom, NE23 7HH	Business through which Plaintiff contracted and worked, responsible for Plaintiff's training and supervision, has information relevant to Plaintiff's qualifications, training, contractual obligations, and past and future earnings.
The Registrar of Companies for England and Wales, its employees and custodians of records	Companies House, Crown Way, Cardiff, CF14 3UZ, DX 33050 Cardiff, United Kingdom, +44 303 1234 500	Has information regarding the scope of Plaintiff's business dealings.
HM Revenue and Customs, its employees and custodians of records	Pay As You Earn and Self Assessment, HM Revenue and Customs, BX9 1AS, United Kingdom	UK governmental entity in possession of tax filings, profit and loss statements, and other documents related to Plaintiff's claimed

		lost past and future earnings.
North Tyneside Council, its employees and custodians of records	Customer Services Blue Badge Team, Quadrant East, 1 <sup>st</sup> Floor Right, 16 The Silverlink North, Cobalt Business Park, North Tyneside, NE27 0BY, 0345 2000 101	Has records related to Plaintiff's post-accident disability claims
NHS Scotland, its employees and custodians of records	NHS Tayside, 230 Clepington Rd, Dundee, DD2 1UB, United Kingdom	Has knowledge of Plaintiff's pre-accident and post-accident medical treatment and costs incurred.
The National Health Service in England its employees and custodians of records	Northumbria Healthcare NHS Foundation Trust, Unit 7-8 Silver Fox Way, Cobalt Business Park, Newcastle upon Tyne NE27 0QJ, United Kingdom	Has knowledge of Plaintiff's pre-accident and post-accident medical treatment and costs incurred.
Netherford House Surgery, its employees and custodians of records, including:  Ms. Nicola Bennett	Station Rd., Seghill, Cramlington, NE23 7EF, United Kingdom	Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.  Occupational Therapist with knowledge of Plaintiff's post-accident medical treatment.
North Tyneside General Hospital, its employees and custodians of records, including:  Mr. B.W.D. Drake  Mr. Chris Harrison	Rake Lane, Tyne and Wear, North Shields, NE29 8NH, United Kingdom	Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.  Orthopedic surgeon with knowledge of Plaintiff's post-accident medical treatment.  Orthopedic surgical assistant with knowledge of Plaintiff's post-accident medical treatment.



Mr. S. Venkatachalam		Consultant orthopedic surgeon with knowledge of Plaintiff's post-accident medical treatment.
Mr. D. Townshend		Consultant orthopedic surgeon, with knowledge of Plaintiff's post-accident medical treatment.
Blyth Valley Intermediate Musculoskeletal Assessment & Treatment Services, its employees and custodians of records, including:  Mr. D. Birchall	Dudley Lane, Cramlington, NE23 6US, United Kingdom	Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.          Neuroradiologist with knowledge of Plaintiff's post-accident medical treatment.
Ninewells Hospital, its employees and custodians of records, including:  Mr. Dalgbeish	James Arrott Drive, Dundee, DD2 1SY, United Kingdom    Norwich, United Kingdom	Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.      Surgeon with knowledge of Plaintiff's post-accident medical treatment.
Northumbrian Healthcare Hospital, and its employees and custodians of records	Unit 7-8 Silver Fox Way Cobalt Business Park, Newcastle upon Tyne, NE27 0QJ, United Kingdom	Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.
Northumbrian Specialist Emergency Care Hospital its employees and custodians of records	Northumbria Way, Cramlington, NE23 6NZ, United Kingdom	Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.

<p>Park View Medical Clinic, its employees and custodians of records, including:</p> <p>Mr. A.O. Adedapo</p>	<p>276 Marton Road, Middlesbrough, TS4 2NS, (01642) 242357</p>	<p>Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.</p> <p>Consultant orthopedic surgeon with knowledge of Plaintiff's post-accident medical treatment.</p>
<p>Tayside Hospital its employees and custodians of records</p>	<p>230 Clepington Rd., Dundee, DD21UB, United Kingdom</p>	<p>Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.</p>
<p>Wansbeck General Hospital, its employees and custodians of records, including:</p> <p>Mr. Sameer Khan</p> <p>Mr. J.L. Sher</p> <p>Mr. Ian Neilly</p>	<p>Woodhorn Lane, Ashington, NE63 9JJ, United Kingdom</p>	<p>Has knowledge of Plaintiff's post-accident medical treatment and costs incurred.</p> <p>Specialist registrar orthopedics with knowledge of Plaintiff's post-accident medical treatment.</p> <p>Orthopedic medicine consultant with knowledge of Plaintiff's post-accident medical treatment.</p> <p>Hematologist with knowledge of Plaintiff's post-accident medical treatment.</p>